

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	<u>INDICTMENT</u>
)	
ERICKA ANDREA MONIQUE JOHNSON)	NO. <u>5:20-CR-334-1</u>
ANTREAL HENDERSON)	NO. <u>5:20-CR-334-2</u>
MARIEL DURAND INGRAM)	NO. <u>5:20-CR-334-3</u>
CORIONTA DOMINIQUE COOPER)	NO. <u>5:20-CR-334-4</u>
FREDERICK DESHAWN JOHNSON)	NO. <u>5:20-CR-334-5</u>
ROBERT AHSAMD JOHNSON)	NO. <u>5:20-CR-334-6</u>
STEPHAN ANTONIO JOHNSON)	NO. <u>5:20-CR-334-7</u>
MONTAGUE AARON MCMILLAN)	NO. <u>5:20-CR-334-8</u>
JASMA TERA MCNEILL)	NO. <u>5:20-CR-334-9</u>
JOHN ARCHIE MCNEILL, JR.)	NO. <u>5:20-CR-334-10</u>
JOHNATHAN MAURICE MACK)	NO. <u>5:20-CR-334-11</u>
STEVEN LARUE ROBINSON)	NO. <u>5:20-CR-334-12</u>
MALCOLM RASOUL SANCHEZ)	NO. <u>5:20-CR-334-13</u>
_____)	

The Grand Jury charges that:

COUNT ONE

1. At all times relevant to this Indictment, Pentagon Federal Credit Union ("PenFed") and USAA Federal Savings Bank ("USAA") were financial institutions within the meaning of Title 18, United States Code, Section 20. It was the practice and policy of both institutions to immediately credit a customer's account at the time a check was deposited, thereby increasing the balance in that account by the amount of such deposit. After the deposit was credited to the account, the customer was able to make immediate cash withdrawals against the increased balance. In the event a

check was not backed by sufficient funds in the payer's account, the financial institutions would not discover this fact until after the check was presented to the issuing bank for payment, typically days later. The delay between the crediting of the check and the presentation of the check for payment was commonly referred to in the banking industry as the "float."

2. A non-sufficient funds ("NSF") check was a term used in the banking industry to refer to a check that could not be honored by the issuing bank upon presentation because, among other possible reasons, the check amount was greater than the balance in the account from which it was drawn, the account was closed, or there was no such account.

THE SCHEME TO DEFRAUD

3. At all times relevant to this Indictment, the Defendants, CORIONTA DOMINIQUE COOPER, ANTREAL HENDERSON, MARIEL DURAND INGRAM, ERICKA ANDREA MONIQUE JOHNSON, FREDERICK DESHAWN JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, MONTAGUE AARON MCMILLAN, JASMA TERA MCNEILL, JOHN ARCHIE MCNEILL JR., JOHNATHAN MAURICE MACK, STEVEN LARUE ROBINSON, and MALCOLM RASOUL SANCHEZ, engaged in a scheme colloquially known as "card-cracking", where the conspirators made NSF check deposits, often via Automated Teller Machine ("ATM"), into checking accounts they opened using the personal identifying information of unsuspecting victims and into checking accounts maintained by collusive accountholders. After the deposits were made, the conspirators conducted

point of sale (“POS”) transactions and cash withdrawals against the deposit credit to obtain money during the “float” period before the financial institution recognized the fraud. The same NSF checks were often deposited into several different checking accounts. The Defendants used ATM/debit cards and associated personal identification numbers (“PINs”) for the accounts they accessed.

4. It was a further part of the scheme and artifice to defraud that the conspirators used the personal identifying information of unsuspecting victims to apply for loans at PenFed.

5. Although most Defendants resided in the Eastern District of North Carolina, it was a further part of the scheme and artifice to defraud that the conspirators often traveled to various locations outside of the Eastern District of North Carolina, including Virginia, Maryland, South Carolina, Georgia, Delaware, New York and New Jersey, to perpetuate the fraud on the targeted financial institutions while slowing down their potential detection.

6. Beginning in or around March 2018, and continuing up to and including the date of this indictment, in the Eastern District of North Carolina and elsewhere, the Defendants, CORIONTA DOMINIQUE COOPER, ANTREAL HENDERSON, MARIEL DURAND INGRAM, ERICKA ANDREA MONIQUE JOHNSON, FREDERICK DESHAWN JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, MONTAGUE AARON MCMILLAN, JASMA TERA MCNEILL, JOHN ARCHIE MCNEILL JR., JOHNATHAN MAURICE MACK, STEVEN LARUE ROBINSON, and MALCOLM RASOUL SANCHEZ, did knowingly

and intentionally combine, conspire, confederate, agree, and have a tacit understanding with each other and other persons both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly execute, and attempt to execute, a scheme and artifice to defraud financial institutions as defined in Title 18, United States Code, Section 20, and to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, to wit: the Defendants, and others both known and unknown to the Grand Jury, defrauded Pentagon Federal Credit Union (“PenFed”), USAA Federal Savings Bank (“USAA”), and other financial institutions by depositing NSF checks, in excess of approximately \$740,000, into checking accounts the conspirators opened and/or accessed, knowing the checks were fraudulent, and later using, or attempting to use, a portion of said funds before the fraud was detected, and by applying for loans in their victims’ names, thereby causing a total approximate loss of more than \$430,000 to said financial institutions, in violation of Title 18, United States Code, Sections 1344(1) and (2).

OBJECT OF CONSPIRACY

7. The object of the conspiracy was to defraud financial institutions and to obtain money, credit, and other things of value from financial institutions.

OVERT ACTS

8. In furtherance of the conspiracy and to effect the object thereof, the Defendants, CORIONTA DOMINIQUE COOPER, ANTREAL HENDERSON, MARIEL DURAND INGRAM, ERICKA ANDREA MONIQUE JOHNSON, FREDERICK DESHAWN JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, MONTAGUE AARON MCMILLAN, JASMA TERA MCNEILL, JOHN ARCHIE MCNEILL JR., JOHNATHAN MAURICE MACK, STEVEN LARUE ROBINSON, MALCOLM RASOUL SANCHEZ, and others both known and unknown to the Grand Jury, committed and caused to be committed one or more of the following overt acts, among others:

a. On or about March 10, 2018, Defendant ROBERT AHSAMD JOHNSON possessed approximately 8 fraudulent State Employee's Credit Union checks bearing the account numbers of other financial institutions and the names of M.L., T.W., and T.S., as well as a USAA debit card in the name of C.M.B. and USAA debit card correspondence in the name of N.L., while seated as a front passenger in a vehicle rented by JOHNSON's girlfriend, J.H., in Hoke County. Law enforcement also recovered a red notebook labeled "Step Da Don" containing the personal identifying information ("PII"), bank account numbers, and passwords of more than ten individuals laying between the front passenger seat and the center console of the vehicle.

b. On or about June 3, 2003, M.W. opened a PenFed account, ending in 6027. On or about October 26, 2018, an unidentified conspirator deposited 3 NSF

checks, totaling approximately \$2,490.00, into the M.W. account via mobile deposit. One of those checks, No. 125 in the amount of \$700.00, was drawn on the closed State Farm Bank account of Q.R., an associate of Defendant MALCOLM RASOUL SANCHEZ. On or about October 27, 2018, an unidentified conspirator deposited 2 additional NSF checks, totaling approximately \$4,100.00, into the M.W. account via mobile deposit. Both checks were determined to be counterfeit. On or about October 29, 2018, Defendant MALCOLM RASOUL SANCHEZ made two \$500.00 withdrawals from the M.W. account at a State Employee's Credit Union ("SECU") ATM in Fayetteville, North Carolina, and made a \$75.74 purchase at a Fayetteville Food Lion. In total, between October 26, 2018, and November 1, 2018, approximately 13 NSF checks, totaling approximately \$27,085.00, were deposited into the M.W. account, and numerous ATM cash withdrawals as well as POS transactions, totaling approximately \$13,575.45, were conducted on the account.

c. On or about November 27, 2018, S.L.'s name, date of birth, and social security number were used to open a USAA account, ending in 3091, via telephone. On or about November 30, 2018, Defendant STEPHAN ANTONIO JOHNSON deposited 2 NSF checks, totaling approximately \$1,000.00, into the S.L. account at an USAA ATM in Fayetteville, North Carolina. Check number 1700, in the amount of \$500.00, was written on the closed PNC Bank account of L.C. and check number 350, in the amount of \$500.00, was written on the Capital One Bank account of C.H. On or about December 1, 2018, an unidentified conspirator deposited 2 additional NSF checks, totaling approximately \$1,000.00, into the S.L. account at an

USAA ATM in Fayetteville, North Carolina. Each of the NSF checks were written for \$500.00 and drawn on the closed USAA Bank account of A.J. The checks, along with several other items, were reported stolen from A.J.'s Robeson County home on or about November 29, 2018. USAA sustained a total approximate loss of \$1,007.48 on the S.L. account.

d. On or about January 22, 2019, N.M.'s name, date of birth, and social security number were used to open a PenFed account, ending in 3022. On or about February 1, 2019, Defendant ROBERT AHSAMD JOHNSON deposited at least 5 NSF checks, totaling approximately \$3,000.00, into the N.M. account at a Navy Federal Credit Union ("NFCU") ATM in Fayetteville, North Carolina, and made two \$500.00 withdrawals. Later that day, an unidentified conspirator conducted two additional POS transactions on the N.M. account, totaling approximately \$981.76, at a Walmart in Raeford, North Carolina. PenFed sustained a total approximate loss of \$1,981.76 on the N.M. account.

e. On or about April 26, 2019, S.C.'s name, date of birth, and social security number were used to open a PenFed account, ending in 6019, via telephone. On or about April 29, 2019, Defendant ROBERT AHSAMD JOHNSON withdrew \$20.00 from the S.C. account at a PenFed ATM in Woodbridge, Virginia. That day, an unidentified conspirator deposited 8 NSF checks, totaling approximately \$3,763.00, into the S.C. account at NFCU ATMs in Dumfries and Richmond, Virginia. An unidentified conspirator also conducted at least 5 transactions on the account, totaling approximately \$2,405.85, via ATM cash withdrawals and POS purchases in

Dumfries, Henrico, and Richmond Virginia. PenFed sustained a total approximate loss of \$2,425.85 on the S.C. account.

f. On or about May 6, 2019, R.B.'s name, date of birth, and social security number were used to open a PenFed account, ending in 7018, via telephone. On or about May 9, 2019, an unidentified conspirator deposited 6 NSF checks, totaling approximately \$3,000.00, into the R.B. account, and 4 withdrawals, totaling approximately \$2,007.48, at an NFCU ATM in Clarksville, Tennessee. One POS transaction, totaling approximately \$483.74, was also conducted at a Clarksville Walmart. That day, 5 additional NSF checks, totaling approximately \$5,000.00, were deposited into the R.B. account at an NFCU ATM in Fayetteville, North Carolina. An individual known to the Grand Jury as D.F. deposited at least 2 of the 5 NSF checks. The checks D.F. deposited were written in \$500.00 increments on the PNC Bank account of D.S., which mirrored the remaining 3 checks deposited in Fayetteville.

On or about May 10, 2019, Defendant ROBERT AHSAMD JOHNSON conducted 7 POS transactions, totaling approximately \$1,396.16, on the R.B. account at a Walmart in Fayetteville, North Carolina. Defendant STEPHAN ANTONIO JOHNSON conducted 1 POS transaction, totaling approximately \$102.01, on the account at the same Walmart. PenFed sustained a total approximate loss of \$4,995.39 on the R.B. account.

g. On or about June 18, 2019, Defendants ROBERT AHSAMD JOHNSON and STEPHAN ANTONIO JOHNSON possessed the PII of approximately 91 individuals. Approximately 54 PenFed accounts were either opened, or attempted to be opened, using the recovered PII, including the S.C. and R.B. accounts referenced in Paragraphs 8(e) and 8(f) above. PenFed also received at least 10 loan applications, totaling approximately \$64,840.00 in requested credit, associated with the recovered PII. PenFed declined the loan applications.

h. On or about July 31, 2019, R.M.'s name, date of birth, and social security number were used to open a PenFed account, ending in 9020, via telephone. On or about August 2, 2019, an unidentified conspirator deposited 9 NSF checks, totaling approximately \$5,340.00, into the R.M. account at an NFCU ATM in Vienna, Virginia, and made two withdrawals, totaling approximately \$1,000, immediately after the deposits. At least 4 of the deposited NSF checks were written on the closed Wells Fargo account of D.G.

On or about August 3, 2019, Defendant STEPHAN ANTONIO JOHNSON made two \$500.00 withdrawals from the R.M. account at an ATM in Gaston, North Carolina, and conducted at least 4 POS transactions, totaling approximately \$1,901.84, at Food Lion stores in Fayetteville, North Carolina. Defendant MONTAGUE AARON MCMILLAN also conducted a \$350.46 POS transaction on the R.M. account at a Fayetteville Food Lion. Later that day, Defendant ERICKA ANDREA MONIQUE JOHNSON deposited 3 additional NSF checks, totaling approximately \$1,810.00, into the R.M. account at an NFCU ATM in

Fayetteville. One of the deposited checks mirrored the D.G. checks deposited into the R.M. account on or about August 2. Defendant ERICKA ANDREA MONIQUE JOHNSON then conducted at least 6 POS transactions, totaling approximately \$1,665.80, at Fayetteville Food Lion and Walmart stores. Defendant ERICKA ANDREA MONIQUE JOHNSON returned to the NFCU ATM and deposited 3 additional NSF checks, totaling approximately \$1,920.00, into the R.M. account. Each deposited check was written on the NFCU account of K.B. Defendant JASMA TERA MCNEILL then conducted at least 2 POS transactions, totaling approximately \$1,180.90, on the R.M. account at a Fayetteville Food Lion. Defendant ERICKA ANDREA MONIQUE JOHNSON conducted at least 2 additional POS transactions, totaling approximately \$356.44, at another Fayetteville Food Lion. PenFed sustained a total approximate loss of \$7,477.66 on the R.M. account.

i. On or about August 12, 2019, A.H.'s name, date of birth, and social security number were used to open a PenFed account, ending in 2028, via telephone. On or about August 15, 2019, Defendant ANTREAL HENDERSON deposited at least 8 NSF checks into the A.H. account at an NFCU ATM in Fayetteville, North Carolina. Each deposited check was written on the closed PNC Bank account of J.C. That day, an unidentified conspirator deposited 19 additional NSF checks into the account and conducted several POS transactions, as well as at least one ATM cash withdrawal, thereby causing PenFed a total approximate loss of \$8,413.96 on the A.H. account.

j. On or about August 17, 2019, K.M.'s name, date of birth, and social security number were used to open a PenFed account, ending in 8024, via telephone. On or about August 21, 2019, Defendant ERICKA ANDREA MONIQUE JOHNSON deposited 12 NSF checks, totaling approximately \$7,170.00, into the K.M. account at an NFCU ATM in Fayetteville, North Carolina. Eight of the checks were written on the PNC Bank account of L.C. and 4 of the checks were written on the SECU account of G.C. That day, Defendant CORIONTA DOMINIQUE COOPER deposited 3 NSF checks, totaling approximately \$1,500.00, into the same account at the same NFCU ATM while Defendant STEPHAN ANTONIO JOHNSON was seated in the passenger seat. The checks mirrored the G.C. checks Defendant ERICKA ANDREA MONIQUE JOHNSON deposited into the account earlier in the day. Defendant STEPHAN ANTONIO JOHNSON also deposited 3 NSF checks, totaling approximately \$1,802.00, into the K.M. account via the same NFCU ATM. The checks mirrored the L.C. checks Defendant ERICKA ANDREA MONIQUE JOHNSON deposited into the account earlier in the day. Defendant JASMA TERA MCNEILL conducted at least 6 transactions, totaling approximately \$2,365.69, on the account at a Fayetteville Walmart. Defendant ERICKA ANDREA MONIQUE JOHNSON conducted 3 transactions, totaling approximately \$1,963.48, at the same Walmart. Defendants ERICKA ANDREA MONIQUE JOHNSON and JASMA TERA MCNEILL were together the same Walmart when a \$597.94 transaction was declined. K.M.'s PenFed debit card was recovered from Defendant ERICKA

ANDREA MONIQUE JOHNSON's home on September 23, 2019. PenFed sustained a total approximate loss of \$7,505.82 on the K.M. account.

k. On or about August 20, 2019, T.C.'s name, date of birth, and social security number were used to open two PenFed accounts, ending in 6026 and 4019, via telephone. Between on or about August 24, 2019, and on or about August 26, 2019, Defendant MALCOLM RASOUL SANCHEZ deposited a total of at least 118 NSF checks, totaling approximately \$56,123.00, into the T.C. accounts at an NFCU ATM in Fayetteville, North Carolina. The deposited checks varied by bank and account name, but they were all printed on similar paper and contained similar security features. On or about August 24, 2019, Defendant MALCOLM RASOUL SANCHEZ conducted at least 2 POS transactions, totaling approximately \$5,004.60, on the account ending in 6026 at Fayetteville Food Lion stores. On or about August 25, 2019, Defendant MALCOLM RASOUL SANCHEZ conducted at least 2 additional POS transactions, totaling approximately \$3,506.04, on the account ending in 6026 at Fayetteville Food Lion and Walmart stores. PenFed sustained a total approximate loss of \$25,210.78 on the T.C. account.

l. On or about August 22, 2019, L.E.'s name, date of birth, and social security number were used to open a PenFed account, ending in 9025, via telephone. On or about August 26, 2019, Defendant STEPHAN ANTONIO JOHNSON deposited at least 14 NSF checks, totaling approximately \$7,900.00, into the L.E. account at an NFCU ATM in Fayetteville, North Carolina. The checks were written in \$500.00, \$600.00, and \$700.00 increments on the USAA Bank account of K.B. That day,

Defendant STEPHAN ANTONIO JOHNSON also conducted at least 2 POS transactions, totaling approximately \$1,000.92, on the account at a Fayetteville Food Lion. Defendant JASMA TERA MCNEILL conducted at least 4 POS transactions, totaling approximately \$1,936.20, on the account at a different Fayetteville Food Lion.

On or about August 27, 2019, Defendant ERICKA ANDREA MONIQUE JOHNSON deposited at least 10 NSF checks, totaling approximately \$6,181.00, into the L.E. account via the same NFCU ATM. With the exception of the dollar amount and listed account number, the checks mirrored the K.B. checks Defendant STEPHAN ANTONIO JOHNSON deposited into the L.E. account on or about August 26. PenFed sustained a total approximate loss of \$13,733.56 on the L.E. account.

m. On or about August 27, 2019, F.S.'s name, date of birth, and social security number were used to open a PenFed account, ending in 7021, via telephone. On or about August 30, 2019, Defendant JOHN ARCHIE MCNEILL JR. deposited 25 NSF checks, totaling approximately \$15,399.69, into the F.S. account at an NFCU ATM in Fayetteville, North Carolina. With the exception of the dollar amount, at least 6 of the deposited checks mirrored the K.B. USAA Bank checks Defendant ERICKA ANDREA MONIQUE JOHNSON deposited into the L.E. account referenced in Paragraph 8(l) above. That day, Defendant JOHN ARCHIE MCNEILL JR. conducted at least 4 transactions on the F.S. account, totaling approximately \$2,404.20, at Walmart and Food Lion stores, as well as a Cash Points ATM, in

Fayetteville. PenFed sustained a total approximate loss of \$9,921.76 on the F.S. account.

n. On or about September 9, 2019, J.J.'s name, date of birth, and social security number were used to open a PenFed account, ending in 0020, via telephone. On or about September 16, 2019, Defendant STEPHAN ANTONIO JOHNSON deposited 7 NSF checks, totaling approximately \$4,080.00, into the J.J. account at an NFCU ATM in Raleigh, North Carolina. That day, Defendant JASMA TERA MCNEILL deposited 6 additional NSF checks, totaling approximately \$3,532.00, into the account at an NFCU ATM in Fayetteville, North Carolina. With the exception of the dollar amount, the checks mirrored the K.B. USAA Bank checks Defendant STEPHAN ANTONIO JOHNSON deposited into the L.E. account referenced in Paragraph 8(l) above. Defendant JASMA TERA MCNEILL also conducted at least 5 transactions on the J.J. account, totaling approximately \$3,844.66, at a Fayetteville Walmart. Defendant ERICKA ANDREA MONIQUE JOHNSON deposited 7 additional NSF checks, totaling approximately \$4,095.00, into the account at an NFCU ATM in Fayetteville, and conducted at least 1 transaction, totaling approximately \$988.74, at a Fayetteville Walmart.

On or about September 17, 2019, Defendant ERICKA ANDREA MONIQUE JOHNSON deposited 5 NSF checks, totaling approximately \$2,760.00, into the J.J. account at an NFCU ATM in Fayetteville. With the exception of the dollar amount, the checks mirrored the K.B. USAA Bank checks referenced above. Defendant JASMA TERA MCNEILL then conducted 3 transactions on the J.J. account, totaling

approximately \$1,020.02, and attempted an \$803.74 transaction that was declined, at a Fayetteville Walmart. Defendant JASMA TERA MCNEILL deposited 3 additional NSF checks, totaling approximately \$1,610.00, into the J.J. account at an NFCU ATM in Fayetteville. They were the same checks written on the USAA Bank account of K.B. PenFed sustained a total approximate loss of \$13,399.60 on the J.J. account.

o. On or about September 12, 2019, A.G.'s name, date of birth, and social security number were used to open a PenFed account, ending in 5025, via telephone. On or about September 16, 2019, Defendant ERICKA ANDREA MONIQUE JOHNSON deposited 11 NSF checks, totaling approximately \$6,460.00, into the A.G. account at NFCU ATMs in Raleigh and Fayetteville, North Carolina. At least 5 of the checks mirrored the checks written on the K.B. USAA Bank account deposited into the PenFed accounts in the names of L.E. and J.J. referenced in Paragraphs 8(l) and 8(n) above. An unidentified individual deposited 10 additional NSF checks, totaling approximately \$6,166.00, into the account at NFCU ATMs in Raleigh and Fayetteville. The same day, Defendant JASMA TERA MCNEILL conducted at least 3 transactions, totaling approximately \$2,501.22, on the A.G. account at a Fayetteville Walmart. PenFed sustained a total approximate loss of \$9,040.80 on the A.G. account.

p. On or about September 23, 2019, Defendant ERICKA ANDREA MONIQUE JOHNSON possessed the PII of more than 180 individuals. Approximately 67 PenFed accounts were either opened, or attempted to be opened,

using the recovered PII, including the K.M. and A.G. accounts referenced in Paragraphs 8(j) and 8(o) above. Law enforcement also recovered a PenFed Visa Debit Card bearing K.M.'s name and card number. More than 50 USAA accounts were either opened, or attempted to be opened, using the same PII.

q. On or about October 1, 2019, A.P.'s name, date of birth, and social security number were used to open two PenFed accounts, ending in 0026 and 6013, via telephone. On or about October 4, 2019, Defendant CORIONTA DOMINIQUE COOPER deposited 11 NSF checks, totaling approximately \$5,500.00, into the A.P. account ending in 0026, at an NFCU ATM in Columbia, South Carolina. Various checks were deposited, including checks written on the closed RBC Bank account of J.G.M., the closed Branch Banking & Trust Company account of K.D.L. and A.S.H., and the closed Fifth Third Bank account of E.W.

On or about October 5, 2019, Defendant MARIEL DURAND INGRAM deposited 6 NSF checks, totaling approximately \$3,300.00, into the A.P. account at an NFCU ATM in Columbia, South Carolina. The checks mirrored the J.G.M. checks Defendant CORIONTA DOMINIQUE COOPER deposited the day prior. An unidentified female conspirator deposited at least 3 E.W. checks into the account at an NFCU ATM in Columbia, South Carolina while seated in the backseat of a vehicle driven by Defendant STEPHAN ANTONIO JOHNSON. Continuing on or about October 5, Defendant JOHN ARCHIE MCNEILL JR. conducted 2 transactions on the A.P. account, totaling approximately \$305.77, at Walmart and Kroger stores in Columbia, South Carolina. Between October 4 and 5, unidentified conspirators

conducted at least 17 POS transactions on the account at Kroger stores in Augusta, Georgia and Columbia, South Carolina, as well as at Walmart stores in Columbia, South Carolina. PenFed sustained a total approximate loss of \$15,244.20 on the A.P. account.

r. On or about October 7, 2019, R.W.'s name, date of birth, and social security number were used to open a PenFed account, ending in 4023, via telephone. On or about October 10, 2019, Defendant JOHN ARCHIE MCNEILL JR. deposited at least 2 NSF checks, totaling approximately \$1,571.76, into the R.W. account at an NFCU ATM in Fayetteville, North Carolina. That day, Defendant JOHN ARCHIE MCNEILL JR. conducted at least 4 transactions, totaling approximately \$2,674.70, on the R.W. account at Walmart and Food Lion stores in Fayetteville and Hope Mills, North Carolina. PenFed sustained a total approximate loss of \$8,204.51 on the R.W. account.

s. On or about October 15, 2019, J.L.'s name, date of birth, and social security number were used to open a PenFed account, ending in 0315, via telephone. On or about October 17, 2019, Defendant MARIEL DURAND INGRAM deposited 17 NSF checks, totaling approximately \$9,400.00, into the J.L. account at an NFCU ATM in Brookhaven, Georgia. At least 7 of the deposited checks mirrored the K.B. USAA Bank checks Defendants ERICKA ANDREA MONIQUE JOHNSON and STEPHAN ANTONIO JOHNSON deposited into the L.E., J.J., and A.G. accounts referenced in Paragraphs 8(l), 8(n) and 8(o) above. That day, Defendant CORIONTA DOMINIQUE COOPER conducted at least 2 transactions, totaling approximately

\$1,987.48, on the J.L. account at a Walmart in Atlanta, Georgia. Defendant MARIEL DURAND INGRAM conducted at least one additional transaction on the account, for approximately \$1,003.74, at the same Walmart. PenFed sustained a total approximate loss of \$8,485.20 on the J.L. account.

t. On or about October 30, 2019, K.J.'s name, date of birth, and social security number were used to open two PenFed accounts, ending in 4015 and 4023, via telephone. On or about November 8, 2019, Defendant MALCOLM RASOUL SANCHEZ deposited 49 NSF checks, totaling approximately \$25,805.00, into the K.J. account ending in 4023 at an NFCU ATM in Cameron, North Carolina. The deposited checks, printed on the same paper with the same security features, listed various entities as payor and K.J. as payee. Defendant FREDERICK DESHAWN JOHNSON deposited 22 additional NSF checks, totaling approximately \$5,390.00, into the K.J. account ending in 4023 at the same NFCU ATM in Cameron. The checks were similar to the ones Defendant MALCOLM RASOUL SANCHEZ deposited into the account. That day, Defendant MALCOLM RASOUL SANCHEZ conducted at least 4 transactions, totaling approximately \$7,012.08, on the K.J. account at a Walmart in Cameron and Food Lion stores in Sanford, North Carolina.

On or about November 9, 2019, an unidentified conspirator deposited 25 NSF checks, totaling approximately \$12,075.00, into the K.J. account ending in 4015 at an NFCU ATM in Cameron, North Carolina. The checks mirrored the checks deposited into the K.J. account ending in 4023 the day prior. That day, Defendant MALCOLM RASOUL SANCHEZ conducted at least 2 transactions on the K.J. account ending in

4023, totaling approximately \$3,002.76, at Food Lion stores in Red Springs and Fayetteville, North Carolina. Defendant SANCHEZ purchased several \$500.00 Western Union money orders, including one issued to the accountholder K.J. PenFed sustained a total approximate loss of \$19,562.58 on the K.J. account.

u. On or about November 13, 2019, L.C.'s name, date of birth, and social security number were used to open a PenFed account, ending in 3024, via telephone. On or about November 18, 2019, the Ring Camera belonging to L.C. captured Defendant MONTAGUE AARON MCMILLAN removing a package from L.C.'s doorstep in West Grove, Pennsylvania, and entering a vehicle driven by Defendant ANTREAL HENDERSON. That day, Defendant ANTREAL HENDERSON deposited 14 NSF checks, totaling approximately \$6,996.00, into the L.C. account at NFCU ATMs in Cherry Hill, New Jersey, and Bel Air, Maryland. At least one of the checks was written on the fictitious SECU account of A.D.M. Defendant MONTAGUE AARON MCMILLAN deposited 13 additional NSF checks into the L.C. account at the same NFCU ATMs. At least 4 of the deposited checks mirrored the checks Defendant HENDERSON deposited into the account.

On or about November 19, 2019, Defendant ANTREAL HENDERSON deposited 21 NSF checks, totaling approximately \$10,500.00, into the L.C. at an NFCU ATM in Fayetteville, North Carolina. The deposited checks included the A.D.M. SECU checks deposited the day before as well as checks written on the USAA Bank account of A.S. and the Wachovia Bank account of D.S. Defendant ANTREAL HENDERSON conducted at least 16 transactions on the L.C. account, totaling

approximately \$6,896.69, at Walmart and Food Lion stores in Lumberton and Red Springs, North Carolina, as well as at an ATM in Fayetteville, North Carolina. PenFed sustained a total approximate loss of \$21,454.70 on the L.C. account.

v. On or about October 5, 2019, Defendant STEVEN LARUE ROBINSON's name, date of birth, and social security number were used to open a PenFed account, ending in 1026, via telephone. On or about November 23, 2019, Defendant FREDERICK DESHAWN JOHNSON deposited 23 NSF checks, totaling approximately \$10,812.00, into the account at an NFCU ATM in Fayetteville, North Carolina. The deposited checks, printed on the same paper with the same security features, listed various entities as payor. Defendant FREDERICK DESHAWN JOHNSON conducted at least 2 transactions, totaling approximately \$3,002.76, on the account at Fayetteville Food Lion stores. Defendant STEVEN LARUE ROBINSON was present for one of those purchases.

On or about November 24, 2019, Defendant FREDERICK DESHAWN JOHNSON deposited 20 NSF checks, totaling approximately \$9,640.00, into the ROBINSON account at an NFCU ATM in Fayetteville. The checks were similar to the checks deposited into the account on or about November 23. Defendants FREDERICK DESHAWN JOHNSON and STEVEN LARUE ROBINSON then conducted at least 1 transaction, for approximately \$1,501.38, at a Walmart in Hope Mills, North Carolina.

On or about November 25, 2019, Defendant FREDERICK DESHAWN JOHNSON also made 2 cash withdrawals, totaling approximately \$1,000.00, at a

Fayetteville NFCU ATM and then deposited 15 NSF checks, totaling approximately \$7,180.00, into the account. The checks were similar to the copies previously deposited. Defendants FREDERICK DESHAWN JOHNSON and STEVEN LARUE ROBINSON then conducted at least 6 transactions, totaling approximately \$5,709.67, at a Walmart in Hope Mills, North Carolina. PenFed sustained a total approximate loss of \$25,775.04 on the ROBINSON account.

w. On or about January 4, 2020, D.O.'s name, date of birth, and social security number were used to open a PenFed account, ending in 1024, via telephone. On or about January 14, 2020, Defendant MALCOLM RASOUL SANCHEZ deposited 44 NSF checks, totaling approximately \$21,875.00, into the D.O. account at an NFCU ATM in Highland Falls, New York. The deposited checks, printed on the same paper with the same security features, listed various entities as payor and were determined to be counterfeit. Defendant MALCOLM RASOUL SANCHEZ conducted at least 2 transactions, totaling approximately \$2,007.48, on the D.O. account at a Walmart in Secaucus, New Jersey. Defendant JOHNATHAN MAURICE MACK conducted at least one transaction on the account, totaling approximately \$903.74, at the same Walmart. Defendant MACK left the store with Defendant STEPHAN ANTONIO JOHNSON. PenFed sustained a total approximate loss of \$8,933.66 on the D.O. account.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH TWENTY-SEVEN

9. Paragraphs 1 – 8 of Count One are incorporated by reference as if fully set forth herein.

10. Beginning on or about the dates listed below and continuing up through and ending on or about the dates listed below, in the Eastern District of North Carolina and elsewhere, Defendants CORIONTA DOMINIQUE COOPER, ANTREAL HENDERSON, ERICKA ANDREA MONIQUE JOHNSON, FREDERICK DESHAWN JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, MONTAGUE AARON MCMILLAN, JASMA TERA MCNEILL, JOHN ARCHIE MCNEILL JR., STEVEN LARUE ROBINSON, MALCOLM RASOUL SANCHEZ, and other persons, both known and unknown to the Grand Jury, did knowingly execute a scheme and artifice to defraud financial institutions as defined in Title 18, United States Code, Section 20, to obtain money, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, that is, Defendants CORIONTA DOMINIQUE COOPER, ANTREAL HENDERSON, ERICKA ANDREA MONIQUE JOHNSON, FREDERICK DESHAWN JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, MONTAGUE AARON MCMILLAN, JASMA TERA MCNEILL, JOHN ARCHIE MCNEILL JR., STEVEN LARUE ROBINSON, MALCOLM RASOUL SANCHEZ and other persons, aiding and abetting each other, deposited NSF checks into Pentagon Federal Credit Union checking accounts the

conspirators opened and/or accessed and later withdrew, or attempted to withdraw, a portion of said funds from the accounts, and made purchases, or attempted to make purchases, against the deposit credit before the fraud was detected, as detailed in the following table, thereby causing losses to Pentagon Federal Credit Union:

COUNT	DEFENDANT	PENFED ACCOUNT	OFFENSE DATE (on or about)	TRANSACTION
2	Malcolm Rasoul Sanchez	M.W. ending in 6027	10/29/2018	\$500 ATM withdrawal
3	Robert Ahsamd Johnson	N.M. ending in 3022	2/1/2019	\$500 ATM withdrawal
4	Robert Ahsamd Johnson	R.B. ending in 7018	5/10/2019	\$501.95 POS transaction
5	Stephan Antonio Johnson	R.B. ending in 7018	5/10/2019	\$102.01 POS transaction
6	Stephan Antonio Johnson	R.M. ending in 9020	8/3/2019	\$500 ATM withdrawal
7	Montague Aaron McMillan	R.M. ending in 9020	8/3/2019	\$350.46 POS transaction
8	Ericka Andrea Monique Johnson	R.M. ending in 9020	8/3/2019	\$640 check deposit (Wells Fargo check no. 188, D.G. listed as payor)
9	Jasma Tera McNeill	R.M. ending in 9020	8/3/2019	\$933.80 POS transaction
10	Antreal Henderson	A.H. ending in 2028	8/15/2019	\$500 check deposit (PNC Bank check no. 717, J.C. listed as payor)
11	Ericka Andrea Monique Johnson	K.M. ending in 8024	8/21/2019	\$710 check deposit (PNC Bank check no. 1315, L.C. listed as payor)

12	Corionta Dominique Cooper	K.M. ending in 8024	8/21/2019	\$500 check deposit (SECU check no. 1148, G.C. listed as payor)
13	Stephan Antonio Johnson	K.M. ending in 8024	8/21/2019	\$640 check deposit (PNC Bank check no. 1319, L.C. listed as payor)
14	Jasma Tera McNeill	K.M. ending in 8024	8/21/2019	\$1,003.74 cash out plus service fee
15	Malcolm Rasoul Sanchez	T.C. ending in 6026	8/26/2019	\$500 check deposit (JP Morgan Chase Bank check no. 274, N.B.C. LLC listed as payor)
16	Stephan Antonio Johnson	L.E. ending in 9025	8/26/2019	\$700 check deposit (USAA Bank check no. 785, K.B. listed as payor)
17	Jasma Tera McNeill	L.E. ending in 9025	8/26/2019	\$407.88 POS transaction
18	Ericka Andrea Monique Johnson	L.E. ending in 9025	8/27/2019	\$720 check deposit (USAA Bank check no. 803, K.B. listed as payor)
19	John Archie McNeill, Jr.	F.S. ending in 7021	8/30/2019	\$750 check deposit (USAA Bank check no. 114, K.B. listed as payor)
20	Jasma Tera McNeill	J.J. ending in 0020	9/16/2019	\$650 check deposit (USAA Bank check no. 704, K.B. listed as payor)
21	Ericka Andrea Monique Johnson	A.G. ending in 5025	9/16/2019	\$610 check deposit (USAA Bank check no. 708, K.B. listed as payor)

22	Ericka Andrea Monique Johnson	J.J. ending in 0020	9/17/2019	\$620 check deposit (USAA Bank check no. 732, K.B. listed as payor)
23	John Archie McNeill, Jr.	R.W. ending in 4023	10/10/2019	\$836.20 check deposit (Fifth Third Bank check no. 2583, E.W. listed as payor)
24	Malcolm Rasoul Sanchez	K.J. ending in 4023	11/9/2019	\$2,502.30 POS transaction
25	Antreal Henderson	L.C. ending in 3024	11/19/2019	\$500 check deposit (USAA Bank check no. 1100, A.S. listed as payor)
26	Frederick Deshawn Johnson	S.R. ending in 1026	11/24/2019	\$480 check deposit (SECU check no. 2545, P.H. listed as payor)
27	Steven Larue Robinson	S.R. ending in 1026	11/25/2019	\$1,501.38 POS transaction

All in violation of Title 18, United States Code, Sections 1344(1), 1344(2) and 2.

COUNTS TWENTY-EIGHT THROUGH THIRTY-ONE

11. Paragraphs 1 – 8 of Count One are incorporated by reference as if fully set forth herein.

12. Beginning on or about the dates listed below and continuing up through and ending on or about the dates listed below, in the Eastern District of North Carolina and elsewhere, Defendants ERICKA ANDREA MONIQUE JOHNSON, ROBERT AHSAMD JOHNSON, STEPHAN ANTONIO JOHNSON, and JASMA TERA MCNEILL, aiding and abetting others known and unknown to the grand jury,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name, bank account number and ATM/debit card issued to the individuals listed below, knowing that the means of identification belonged to another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, and bank fraud, in violation of Title 18 United States Code, Section 1344, as charged in the counts listed below and incorporated herein:

COUNT	DEFENDANT	OFFENSE DATE(S) (on or about)	IDENTITY	CHARGED COUNTS
28	Robert Ahsamd Johnson	2/1/2019	N.M.	1, 3
29	Ericka Andrea Monique Johnson	7/31-8/3/2019	R.M.	1, 8
30	Stephan Antonio Johnson	8/21/2019	K.M	1, 13
31	Jasma Tera McNeill	9/16/2019	J.J.	1, 20

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE NOTICE

Upon conviction of one or more of the offenses set forth in Counts One through Twenty-Seven of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation.

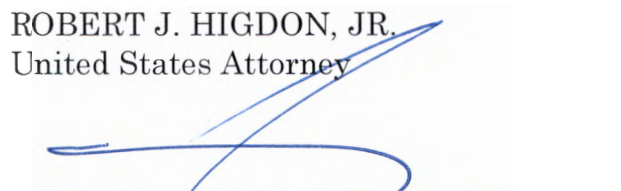
If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL


FOREPERSON

7-8-2020
DATE

ROBERT J. HIGDON, JR.
United States Attorney


TAMIKA GRIFFIN MOSES
Special Assistant United States Attorney